

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GLENN P. NELSON,

Plaintiff,

v.

BANK OF AMERICA, NATIONAL
ASSOCIATION; EQUIFAX
INFORMATION SERVICES, LLC; and
TRANS UNION LLC,

Defendants.

Case No. 1:19-cv-02023

Honorable Manish S. Shah

MOTION TO DISMISS

NOW COMES Plaintiff, GLENN P. NELSON, through counsel, pursuant to Fed. R. Civ. P. 41(a)(2), moving this Court to dismiss this action against Defendant, TRANS UNION LLC. In support thereof, Plaintiff states as follows:

1. On March 25, 2019, Plaintiff filed a Complaint alleging Trans Union's willful or negligent violations of Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 *et seq.*
2. On May 9, 2019, Trans Union filed a Motion for Judgment on the Pleadings pursuant to Fed. R. Civ. P. 12(c) in this case. [Dkt. # 24].
3. Plaintiff no longer wishes to pursue claims against Trans Union for its alleged willful or negligent violations of FCRA.
4. Accordingly, Plaintiff wishes to dismiss this action against Trans Union with prejudice
5. Plaintiff's counsel conferred with Trans Union's counsel regarding stipulation of dismissal; however, Trans Union's counsel isn't amenable without additional consideration.

6. Fed. R. Civ. P. 41(a)(2) states “an action may be dismissed at the plaintiff’s request only by court order, on terms that the court considers proper.”

7. Here, dismissal is appropriate as Plaintiff no longer wishes to proceed on claims against Trans Union; instead, concentrating solely on claims against remaining defendants.

WHEREFORE, Plaintiff respectfully requests the Court dismiss this action against Trans Union with prejudice; and grant such other relief as this Court deems just and proper.

DATED: June 6, 2019

Respectfully submitted,

GLENN P. NELSON

By: /s/ Joseph S. Davidson

Joseph S. Davidson
Mohammed O. Badwan
SULAIMAN LAW GROUP, LTD.
2500 South Highland Avenue
Suite 200
Lombard, Illinois 60148
+1 630-575-8181
jddavidson@sulaimanlaw.com
mbadwan@sulaimanlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2019, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Joseph S. Davidson